

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et)	
al.,)	
)	
<i>Plaintiffs,</i>)	
)	5:21-cv-00844-XR
v.)	
)	
GREGORY W. ABBOTT, et al.,)	
<i>Defendants.</i>)	

**DEFENDANT BEXAR COUNTY ELECTION ADMINISTRATOR
JACQUELYN CALLANEN'S INITIAL DISCLOSURES**

Now comes Defendant Bexar County Elections Administrator Jacquelyn Callanen and submits these Initial Disclosures Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure.

- 1) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely impeachment:

RESPONSE:

Jacquelyn Callanen, Bexar County Elections Administrator
Employees of the Bexar County Elections Department
Bexar County Elections Department
1103 S. Frio, Suite 100
San Antonio, TX 78207
(210) 335-8683
Defendant

Ms. Callanen is a Defendant herein. Ms. Callanen and employees of the Bexar County Election Administrator's Office have knowledge about election results and voting records related to past elections, and about the probable impact of SB 1 on Bexar County voters.

John B. Scott
Secretary of State

P.O. Box 12887
Austin, Texas 78711

Information about state-wide voter registration and participation; information about the interpretation and implementation of SB 1:

Keith Ingram
Texas Secretary of State
Director, Elections Division
P.O. Box 12060
Austin, Texas 78711

Mr. Scott, Mr. Ingram, and other employees of the Secretary of State's Office have knowledge about state-wide voter registration and participation and the interpretation provided for the implementation of SB 1 by state and local elections officials.

Additional witnesses who may have discoverable information that Defendant Callanen may rely upon to assert her claims include: (1) all expert witnesses designated by any party in any of the consolidated cases; (2) all individuals designated by any party in any of the consolidated cases as a Rule 30(b)(6) witness; (3) all individuals or entities served with a subpoena by any party in any of the consolidated cases during the course of this suit; (4) all individuals or entities noticed and/or deposed in any of the consolidated cases; and (5) all individuals or entities referred to in any document produced by any party or other individual or entity in any of the consolidated cases. Defendant Callanen will timely amend or supplement this list of persons having knowledge of facts relevant to her defenses as the investigation into the facts relevant to this case continues. Defendant further reserves the right to modify the above list and to identify and call as witnesses additional persons if, during the course of the investigation and discovery related to this case, Defendant learns that such additional persons have knowledge or information that Defendant may use to support her defenses.

- 2) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;
 - a. Motions, pleadings, exhibits, and other public filings or documents exchanged in this litigation;
 - b. Documents relating to Bexar County's current policies and/or practices for voter registration and elections administration;Bexartech15
 - c. Documents relating to the advisories or directives from the Texas Secretary of State with respect to implementing and enforcing SB1;

- d. Documents relating to the burdens on voters in Bexar County from enforcement of SB1;
 - e. Documents relating to the burdens on Defendant Callanen and other officials of Bexar County resulting from enforcement of SB1;
 - f. Documents relating to whether the burdens imposed by SB1 on voters and on Bexar County are necessary to conduct secure elections;
 - g. Documents relating to whether the burdens imposed by SB1 may suppress lawful voter turnout;
 - h. Documents concerning evidence relating to benefits, or the lack thereof, accruing to the County and State from enforcement of SB1; and
 - i. Relevant documents identified during discovery, which is ongoing.
- 3) A computation of each category of damages claimed by the disclosing party-who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

RESPONSE: Not applicable.

- 4) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action of to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: Not applicable.

Respectfully Submitted,

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Bexar County Criminal District Attorney

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Attorney for Bexar County Elections

Administrator Jacquelyn Callanen

CERTIFICATE OF SERVICE

I do hereby certify on the 5th day of November, 2021, I served the preceding Disclosures by email upon the following:

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